

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
IN ADMIRALTY

PLATINA BULK CARRIERS PTE LTD,	)	Civil Action No.: 2:22-cv-1851-RMG
	)	
Plaintiff,	)	
	)	<b>DECLARATION IN SUPPORT OF</b>
vs.	)	<b>PRAYER FOR MARITIME</b>
	)	<b>ATTACHMENT AND SPECIAL</b>
PRAXIS ENERGY AGENTS DMCC,	)	<b>PROCESS SERVER</b>
PRAXIS ENERGY AGENTS LLC, and	)	
PRAXIS ENERGY AGENTS PTE LTD.	)	
	)	
Defendants.	)	

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Ryan D. Gilsean, declares upon penalty of perjury as follows:

1. I am a member of the Bar of this Court and represent the Plaintiff herein. I am familiar with the facts of this case and make this Declaration in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure.

THE DEFENDANT IS NOT WITHIN THIS DISTRICT

2. I have attempted to locate the Defendants, PRAXIS ENERGY AGENTS DMCC, PRAXIS ENERGY AGENTS LLC, and PRAXIS ENERGY AGENTS PTE LTD. ("Defendants") within this District. As part of my investigation, I conducted an internet search of Defendants to identify locations, contact information, or phone contacts for the Defendants within this District and found none. I also checked the South Carolina Department of State, Business Entity Search online database which showed no listing or registration for the Defendants. I was also unable to find any information to indicate that the Defendants have a general or managing agent within the District. Upon information and belief, Praxis Energy Agents, LLC is a Texas corporation with its

principal place of business in Houston, Texas. However, I am unable to locate any website for it despite a diligent internet search.

3. I submit that Defendants cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

4. Upon information and belief, the Defendants have, or will have during the pendency of this action, tangible and intangible property within the District subject to the jurisdiction of this Court in the form of proceeds from a judicial vessel sale due and owing to the Defendants in the hands of Cooper & Bilbrey P.C., which has its principal place of business in Mt. Pleasant, South Carolina.

**PRAAYER FOR RELIEF FOR AN ORDER ALLOWING SPECIAL PROCESS SERVER**

5. Plaintiff seeks an Order, pursuant to Rule 4(c) of the Federal Rules of Civil Procedure, appointing any partner, associate, paralegal, or agent of Hines & Gilsenan LLC., to serve the Verified Complaint, Process of Maritime Attachment and Garnishment, Interrogatories or other process, including any amended pleadings filed in this action, upon the garnishee Cooper & Bilbrey P.C. and/or its bank who, based upon information and belief may hold assets of, for or on account of the Defendants.

6. Plaintiff seeks this Order to serve the Process of Maritime Attachment and Garnishment with deliberate speed in order to fully protect itself against the potential of Defendants being unable to satisfy any judgment or award obtained by Plaintiff against Defendants.

7. To the extent that Plaintiff's Application for an Order appointing a special process server does not involve the restraint of physical property, service does not need to be effected by

the Marshal's Office. Service sought to be carried out by Plaintiff is the delivery of the Process of Maritime Attachment and Garnishment to the garnishee identified in the writ.

**PRAYER FOR RELIEF TO SERVE LATER IDENTIFIED GARNISHEES**

8. Plaintiff further requests that this Court grant it leave to serve any additional garnishee(s) who may, upon information and belief, have obtained in the course of this litigation, be holding or believed to be holding, property of the Defendants, within this District. Obtaining leave of Court at this time to serve any later identified garnishee(s) will allow for prompt service of the Writ of Maritime Attachment and Garnishment without the need to present to the Court amended Process to add future identified garnishee(s).

**PRAYER FOR RELIEF TO DEEM SERVICE CONTINUOUS**

9. Plaintiff also respectfully requests that the Court grant it leave, as set out in the accompanying Ex Parte Order for Process of Maritime Attachment, for any process that is served on a garnishee to be deemed effective and continuous service of process throughout any given day on which process is served throughout the day from the time of such service through the opening of the garnishee's business each successive business day, continuing through the receipt by Cooper & Bilbrey, P.C. and/or its financial institution(s) of the funds disbursed from the Court's registry in the case entitled *Carl Schröter v. Smooth Navigation*, 2:20-cv-334-RMG, by the Court's Order dated June 8, 2022 (ECF 172);

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 10, 2022.




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Ryan D. Gilsenan